

# **EXHIBIT**

## **WW**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to:  <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

**DECLARATION OF CECIL WARD**

I, Cecil Ward, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached, as Exhibit A to this Declaration, is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present in New York City when the terrorist attacks of the World Trade Center Towers occurred. At the time of the attacks, I was working at Aon as an Insurance Underwriter. I was on the 48<sup>th</sup> floor of the World Trade Center South Tower when the first plane struck the North Tower.

4. I began my shift at 8 a.m. on 9/11. While I was sitting at my desk on the 48th floor, I heard a loud explosion. I looked out of a window facing the North Tower and I discovered that an airplane had crashed into the building. I began to feel uneasy and I decided that I should leave my office and get out of the South Tower. At about that time, I heard an announcement that the

South Tower was safe and that we should all remain or return to our offices. I decided to leave despite the announcement and I headed towards the stairwell.

5. I made my way down the stairwell, and when I was almost half way to the bottom floor, a second airplane plunged into the South Tower. The emergency doors to the stairwell immediately slammed shut, trapping people who were still outside of the stairwell. The building then made this terrible noise and people began to quickly move down the stairwell in an attempt to escape. Before I could escape the stairwell and exit onto the ground floor, the South Tower collapsed. I was partially buried in the building rubble, but I was somehow able to pull myself free of the debris. In the cloud of smoke, dust, and debris, people helped me to an ambulance, which then rushed me to Brooklyn Hospital.

6. At Brooklyn Hospital, I was treated for significant injuries to my left leg as well as injuries to my lungs and airway due to the large amounts of smoke, dust and debris that I inhaled while trapped in the building rubble. Had I not made the quick decision to leave the South Tower despite the announcement to remain in my office, I might not have survived this horrible ordeal.

7. As a result of these terrorist attacks, I suffered the following specific physical injuries on September 11, 2001: a fractured left leg with extreme muscle stress and trauma; left hip displacement; fractured ribs; neck and back tenderness in the area of my thoracic spine; pulmonary issues, including asthma, shortness of breath, sinusitis, mild obstructive airway disease, and reactive airway disease.

8. I further suffered, and continue to suffer, severe emotional distress as a result of these terrorist attacks. I suffered and continue to suffer from anxiety and bouts of depression due to these traumatic events almost daily, triggered by certain smells, sounds, and views. I have been diagnosed with a major depressive disorder with recurrence, post-traumatic stress disorder, an

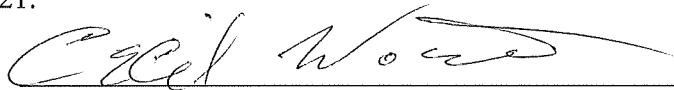
anxiety disorder, and a panic disorder. The horrific events that I witnessed on 9/11 directly caused all of the above conditions, which continue to this day. In the course of the above terrorist attacks and my escape from the South Tower, I witnessed events beyond the imagination of the average citizen. The situation could only be compared to a war zone.

9. I sought and continue to seek medical attention on a monthly basis for my physical and emotional injuries caused by these terrorist attacks. Attached as Exhibit B to this Declaration is a true and correct copy of my select relevant medical records related to the treatment that I received for my physical and emotional injuries following the September 11, 2001 terrorist attacks.

10. I previously pursued a claim through the September 11th Victim Compensation Fund (VCF Number VCF-0049791) specifically related to my physical injuries incurred on September 11, 2001, and my claim was determined to be eligible for compensation.

I DECLARE, VERIFY AND STATE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

DATED this 20<sup>th</sup> day of January 2021.

A handwritten signature in cursive script, appearing to read "Cecil Ward", written over a horizontal line.

Declarant, Cecil Ward

**EXHIBITS  
FILED  
UNDER SEAL  
(ECF No.  
5716)**